## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL CAIN AND EMILY CAIN,

Plaintiffs,

v. DOCKET NO.: 21-cv-12100-RWZ

SUNRISE ASSITED LIVING MANGEMENT, INC. AND SUNRISE SENIOR LIVING MANAGEMENT, INC.

Defendants.

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## DEFENDANT SUNRISE SENIOR LIVING MANAGEMENT, INC. F/K/A SUNRISE ASSISTED LIVING MANAGEMENT, INC.'S ASSENTED TO MOTION TO EXTEND DEADLINE TO ANSWER FIRST AMENDED COMPLAINT

Pursuant to Fed. R. Civ. 6 (b) (1) (A), the defendant in the above-captioned matter, Sunrise Senior Living Management, Inc. f/k/a Sunrise Assisted Living Management, Inc., hereby moves for an extension of thirty (30) days to file an Answer to the Amended Complaint of Plaintiffs Michael and Emily Cain. As grounds therefore, the defendant states that the parties are engaged in settlement discussions and are attempting to resolve the case through settlement. The defendant asks that the answer to the amended complaint by due on or before May 11, 2022.

Plaintiffs assent to this motion.

WHEREFORE, the defendant Sunrise Senior Living Management, Inc. f/k/a Sunrise Assisted Living Management, Inc. respectfully requests that this Honorable Court grant the defendant an extension to May 11, 2022 to file an answer to the amended complaint.

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DEFENDANT,

SUNRISE SENIOR LIVING MANGEMENT, INC. F/K/A SUNRISE ASSISTED LIVING MANAGEMNET, INC.

By Its Attorneys,

/s/ Joseph M. Fogarty
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## **CERTIFICATE OF SERVICE**

I, Joseph M. Fogarty, counsel for the Defendants, hereby certify that this document was filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 11, 2022.

Christopher N. Hug, Esq. BBO #546960 The Law Office of Christopher Hug, PC One State Street, Suite 1050 Boston, MA 0400 (617) 227-0400 Hug873@msn.com

Dated: April 11, 2022 Attorney: /s/ Joseph M. Fogarty

Joseph M. Fogarty